

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,  
  
Plaintiff,

v.

MICROSOFT CORPORATION, *et al.*,  
  
Defendants.

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DAILY NEWS, *et al.*,

Plaintiffs,

v.

MICROSOFT CORPORATION, *et al.*,  
  
Defendants.

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THE CENTER FOR INVESTIGATIVE  
REPORTING, INC.,

Plaintiff,

v.

OPENAI, INC., *et al.*,

Defendants.

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Case No. 1:23-cv-11195-SHS-OTW  
Case No. 1:24-cv-3285-SHS-OTW  
Case No. 1:24-cv-04872-SHS-OTW

Hon. Sidney H. Stein

**[PROPOSED] ORDER GRANTING  
MOTION TO ADMIT COUNSEL *PRO  
HAC VICE***

The motion of Michael S. Kwun for admission to practice Pro Hac Vice in the above captioned action is granted.

Applicant has declared that he is a member in good standing of the bar of the State of California; and that his contact information is as follows:

Michael S. Kwun  
Kwun Bhansali Lazarus LLP  
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San Francisco, CA 94111  
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Applicant having requested admission Pro Hac Vice to appear for all purposes as counsel for Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC in the above-entitled action:

**IT IS HEREBY ORDERED** that Applicant is admitted to practice Pro Hac Vice in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: \_\_\_\_\_

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Hon. Sidney H. Stein  
United States District Judge